

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC

Comments on Docket No. 99-325, Unattended Broadcast Station Operation
COMMENTS

Now comes Randal J. Miller, president of Miller Media Group, comprised of Miller Communications, Inc., licensee of WTIM-FM Taylorville, IL, and WMKR(FM) Pana, IL; Kaskaskia Broadcasting, Inc., licensee of WRAN (FM) Tower Hill, IL; and Virden Broadcasting Corp., licensee of WKEI (AM) Kewanee, IL; WJRE (FM) Galva, IL; WYEC (FM) Kewanee, IL; and WGEN (AM) Geneseo, IL, with comments on docket # 99-325, regarding unattended broadcast station operation.

The rules as they now exist, provide broadcasters in all size markets, the flexibility to operate a portion of their broadcast hours, in an unattended manner. This allows our stations, as well as others across the nation, to serve our listeners 24/7 for local news, weather, sports and entertainment programming. Requiring manned operation for nights and weekends, will--especially in our small markets--cause us to have to cut the service we provide our listeners, by cutting broadcast hours of operation. This will LESSEN the amount of service we provide our listeners.

We, and many in the broadcast industry, have our EAS boxes set to automatically interrupt programming on all of our stations, anytime the National Weather Service issues any watch or warning, for any portion of our listening area. Additionally, we have a different person on call during the overnight and weekend hours, whose job it is to come in and do live reports on weather and any related damage in any portion of our stations' coverage areas.

May we suggest to the Commission, that a better approach, rather than forcing us to cut broadcast hours because of the additional costs that manning our stations overnights and weekends would cause, would be to require broadcasters to set their EAS boxes to automatically interrupt programming for any National Weather Service severe weather watches or warnings that pertain to a station's coverage area. That will enable listeners no matter what time of day or night, to get instant information on severe weather or other emergencies.

We encourage the FCC to fully think thru any proposal that will require broadcasters to have their stations manned anytime our transmitters are on. Our 7 stations will be forced to cut the number of hours we broadcast, if we have to have a manned operation anytime the transmitters are on.